

1 John R. Hillsman (CA SBN 71220)
2 uroy3@aol.com
3 Abraham Feinstein-Hillsman (CA SBN 241810)
4 bfb003@gmail.com
5 McGUINN, HILLSMAN & PALEFSKY
6 535 Pacific Avenue
7 San Francisco, CA 94133
tel: (415) 421-9292 fax: (415) 403-0202

7 Attorneys for Plaintiff ALLEN SHAHAN
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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA

12 ALLEN SHAHAN,) No. CV 13 3594 NC
13)
14 Plaintiff,)
15)
16 vs.) JOINT STIPULATED REQUEST
17 GOLDEN STATE BRIDGE, INC.,) FOR THE CONTINUANCE OF
18 Defendant.) DEFENDANT'S MOTION FOR
) SUMMARY JUDGMENT AND
) ~~[PROPOSED]~~ ORDER THEREON
) AS MODIFIED

19 WHEREAS:

20 1. This Claim is currently set for trial on March 9, 2015.
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22 2. Defendant GOLDEN STATE BRIDGE, INC.'S Motion for Summary Judgment
herein is scheduled to be heard on February 4, 2015, and the deadline for Plaintiff to file his
23 opposition thereto is Wednesday, January 14, 2015.
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25 2. Plaintiff's Counsel, John R. Hillsman and Abraham Feinstein Hillsman, currently
26 have a conflicting Jury trial that began on December 1, 2014, and is continuing. ("Conflicting
27 Matter"). The Conflicting Matter is entitled *Michael Prickett and Marya Takamori- Prickett v.*
Bonnier Corporation; Warren Miller Entertainment, Inc.; Bare Sports Canada, LTD; Bare Sports
USA, Corp. and Does 1 through 30 inclusive, (County of Alameda Case No RG12655617)

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3. Plaintiffs' counsel have reason to believe that the conclusion of the trial of the
Conflicting Matter will not occur prior to the above-mentioned January 14, 2015 filing deadline.

1 THEREFORE, THE PARTIES HEREBY JOINTLY STIPULATE AND REQUEST THAT:

2 1. Defendants Motion for Partial Summary Judgment herein be taken off calendar for
3 1:00 p.m. on February 4, 2015.

4 2. Defendant's Motion for Partial Summary Judgment be reset for hearing on
5 Wednesday, February 18, 2015, at 1:00 p.m. in Courtroom 7 of this Court, located at 280 South
6 1st Street, San Jose, California 95113.

7 3. The date for Plaintiff to submit his opposing papers to Defendant's Motion for
8 Summary Judgment shall be continued from January 14, 2015, to the new date of January 28, 2015.

9 4. The date for Defendant to submit its reply papers to Plaintiff's opposition shall be
10 continued from January 23, 2015 to the new date of Friday, February 6, 2015.
11

12 Dated: January 8, 2015

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14 McGUINN, HILLSMAN & PALEFSKY
15 Attorneys for Plaintiff ALLEN SHAHAN
16

17 By: /s/ JOHN R. HILLSMAN
18 JOHN R. HILLSMAN

19 Dated: January 9, 2015

20 COX, WOOTTON, LERNER, GRIFFIN,
21 HANSON & POULOS
22 Attorneys for Defendant
23 GOLDEN STATE BRIDGE, INC.

24 By: /s/ RICHARD R. WOOTTON
25 RICHARD R. WOOTTON

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28 **ATTESTATION OF COUNSEL AS TO SIGNATURE**

Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures, John R. Hillsman
hereby attests that concurrence in the filing of this document has been obtained.

1
2 ~~[PROPOSED]~~
3 O R D E R
4

5
6 The parties' Joint Stipulation and Proposed Order is hereby adopted by the Court, and
7 the Court hereby orders that:
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10 1. Defendant's Motion for Partial Summary Judgment is continued from February 4,
11 25 2:00
12 2015, to the new date of Wednesday, February 18, 2015, at 1:00 p.m. in Courtroom 7 of this Court,
13 located at 280 South 1st Street, San Jose, California;
14

15 2. Plaintiff's deadline to submit opposing papers to Defendant's Motion for Summary
16 Judgment is continued from January 14, 2015 to the new date of Wednesday, January 28, 2015;
17 and,
18

19 3. Defendant's deadline to submit reply papers to Plaintiff's opposition to Defendant's
20 Motion for Summary Judgment is continued from January 23 to the new date of Friday, February
21 6, 2015.
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24 IT IS SO ORDERED.
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27 Dated: January 12, 2015
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